



THE CITY OF NEW YORK
LAW DEPARTMENT

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February 3, 2025

BY ECF

Honorable P. Kevin Castel
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

The proposed schedule is approved, except the pre-motion letter is due July 18, 2025. A telephone conference will be held August 1, 2025 at 10:30 a.m. Call-In: 855-244-8681, Access Code: 2305 810 3970#.

SO ORDERED>
Dated: 2/4/2025

A handwritten signature in black ink that reads "P. Kevin Castel".

P. Kevin Castel
United States District Judge

Re: Carlos Alvarez v. City of New York, et al.
22-CV-8689 (PKC)

Your Honor:

I am the Senior Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel for the City of New York, and the attorney assigned to represent defendant Alexis Soto in the above-referenced matter. The parties write to respectfully request that the Court endorse the below discovery schedule.

By way of background, on March 15, 2024, this Court issued its decision on defendants' motion to dismiss plaintiff's fifth amended complaint, leaving two claims remaining in this case against defendant Soto. *See* Civil Docket Sheet Entry No. 66. On September 5, 2024, defendant Soto filed her answer to the fifth amended complaint. *See id.* at Entry No. 72. No discovery schedule has been endorsed by the Court.

Accordingly, the parties write to respectfully request that the Court endorse the following proposed discovery schedule:

- Initial Disclosures to be completed by March 31, 2025;¹
- All fact discovery to be completed by July 1, 2025; and
- Pre-motion letter regarding Rule 56 motion to be filed by ~~August 1, 2025~~ July 18, 2025.

¹ This date is requested by counsel for plaintiff, who is experiencing a backlog because they have recently moved offices.

The parties thank the Court for its time and attention to this matter.

Respectfully submitted,

/s Carolyn K. Depoian
Carolyn K. Depoian
Senior Counsel

cc: *Counsel for plaintiff*